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7 Attorneys for Defendant  
8 DBEST PRODUCTS, INC.

9 **UNITED STATES DISTRICT COURT**  
10 **CENTRAL DISTRICT OF CALIFORNIA**

11 HANGZHOU ALFA TRADING CO.  
12 LTD., a foreign limited liability  
13 corporation and ZHEJIANG PLASTIE  
14 INDUSTRY CO., LTD., a foreign  
limited liability corporation.

15 Plaintiffs

16 v.

17 DBEST PRODUCTS, INC., a California  
18 corporation,

19 Defendant.

CASE NO. 2:25-cv-00471 PA (PDx)

**ANSWER**

**DEMAND FOR JURY TRIAL**

Complaint filed: January 17, 2025

Trial date: None assigned

**NATURE OF THE ACTION**

1  
2 1. dbest products, Inc. (“dbest”) admits that the First Amended Complaint  
3 is an action under the patent laws and that Exhibit A is a copy of the ’576 Patent. dbest  
4 denies the remaining allegations of paragraph 1.

5 2. dbest admits that Amazon removed the product listings because of  
6 dbest’s accusation that they infringed the ’576 Patent. dbest denies the remaining  
7 allegations of paragraph 2.

8 3. dbest admits that on or around December 15, 2024, dbest reported the  
9 Alfa Products for infringement of the ’576 Patent. dbest denies the remaining  
10 allegations of paragraph 3.

11 4. dbest admits that Amazon removed the product listings because of  
12 dbest’s accusation that they infringed the ’576 Patent. dbest denies the remaining  
13 allegations of paragraph 4.

14 5. dbest admits that on or around November 21, 2024, dbest reported the  
15 Enhomme Products to Amazon for infringement of the ’576 Patent. dbest denies the  
16 remaining allegations of paragraph 5.

17 6. dbest admits that Amazon removed the product listings because of  
18 dbest’s accusation that they infringed the ’576 Patent. dbest denies the remaining  
19 allegations of paragraph 6.

20 7. dbest denies the allegations of paragraph 7.

21 8. dbest lacks knowledge or information sufficient to form a belief as to  
22 the truth of the allegations set forth in paragraph 8 and on that basis denies them.

23 9. dbest admits the allegations of paragraph 9.

24 10. dbest admits the allegations of paragraph 10.

25 11. dbest admits the allegations of paragraph 11.

26 12. dbest admits the allegations in paragraph 12.

27 13. dbest lacks knowledge or information sufficient to form a belief as to  
28 the truth of the allegations set forth in paragraph 13 and on that basis denies them.

1 14. dbest lacks knowledge or information sufficient to form a belief as to  
2 the truth of the allegations set forth in paragraph 14 and on that basis denies them.

3 15. dbest lacks knowledge or information sufficient to form a belief as to  
4 the truth of the allegations set forth in paragraph 15 and on that basis denies them.

5 16. dbest lacks knowledge or information sufficient to form a belief as to the  
6 truth of the allegations set forth in paragraph 16 and on that basis denies them.

7 17. dbest lacks knowledge or information sufficient to form a belief as to  
8 the truth of the allegations set forth in paragraph 17 and on that basis denies them.

9 18. dbest lacks knowledge or information sufficient to form a belief as to the  
10 truth of the allegations set forth in paragraph 18 and on that basis denies them.

11 19. dbest lacks knowledge or information sufficient to form a belief as to the  
12 truth of the allegations set forth in paragraph 19 and on that basis denies them.

13 20. dbest denies the allegations of paragraph 20.

14 21. dbest admits that there is a justiciable controversy. dbest denies the  
15 remaining allegations of paragraph 21.

16 22. dbest admits that Hangzhou Alfa Trading Co., Ltd. (“Alfa”) and  
17 Zhejiang Plastic Industry Co., Ltd. (“ZXP”) seek relief based on the four identified  
18 legal theories. dbest denies the remaining allegations of paragraph 22.

19 23. dbest admits that the FAC seeks a declaratory judgment of non-  
20 infringement of the ’576 Patent. dbest denies the remaining allegations of paragraph  
21 23.

22 **PARTIES**

23 24. dbest lacks knowledge or information sufficient to form a belief as to  
24 the truth of the allegations set forth in paragraph 24, and on that basis denies them.

25 25. dbest lacks knowledge or information sufficient to form a belief as to  
26 the truth of the allegations set forth in paragraph 25, and on that basis denies them.

27 26. dbest denies the allegations set forth in paragraph 26. Dbest’s principal  
28 place of business is at 16506 Avalon Blvd., Carson, CA 90746.

1 27. dbest admits the allegations set forth in paragraph 27.

2  
3 **JURISDICTION AND VENUE**

4 28. dbest admits the allegations set forth in paragraph 28.

5 29. Dbest admits the allegations set forth in paragraph 29.

6 30. dbest admits that it filed claims of infringement with Amazon that  
7 resulted in the removal of Plaintiffs' product listings. dbest denies the remaining  
8 allegations of paragraph 30.

9 31. dbest admits the allegations set forth in paragraph 31.

10 32. dbest admits the allegations set forth in paragraph 32.

11 33. dbest admits that venue is proper in this district; dbest denies the  
12 remaining allegations of Paragraph 33.

13  
14 **COUNT I**

15 **(Declaratory Judgment of Non-Infringement of the '576 Patent)**

16 34. dbest incorporates by reference its responses to paragraphs 1-33 as if  
17 fully set forth in this paragraph.

18 35. dbest admits the allegations set forth in paragraph 35.

19 36. dbest denies the allegations set forth in paragraph 36.

20 37. dbest denies the allegations set forth in paragraph 37.

21 38. dbest denies the allegations set forth in paragraph 38.

1                                   **PRAYER FOR RELIEF**

2           dbest denies that Alfa or ZXP is entitled to any relief. dbest requests that the  
3 Court enter judgment in its favor on all claims and award it reasonable costs and  
4 attorneys' fees and any further relief the Court deems appropriate.

5  
6                                   **FIRST AFFIRMATIVE DEFENSE**

7                                   **(Infringement)**

8           Plaintiff's Accused Products directly or indirectly infringe at least one claim  
9 of the '576 Patent.

10  
11  
12                                  **SECOND AFFIRMATIVE DEFENSE**

13                                  **(Validity and Enforceability)**

14           All claims of the '576 Patent are valid and enforceable under 35 U.S.C. § 1 *et*  
15 *seq*, and Plaintiff will not be able to demonstrate by clear and convincing evidence  
16 that they are otherwise.

17  
18  
19                                  **THIRD AFFIRMATIVE DEFENSE**

20                                  **(No injury or standing)**

21           Plaintiff has suffered no injury and lack standing.

22  
23                                  **FOURTH AFFIRMATIVE DEFENSE**

24                                  **(Limitation on Damages)**

25  
26           Plaintiff's claims for attorney's fees are barred, in whole or in part, at least  
27 because this case is not exceptional and Defendant's alleged actions were not  
28 willful and malicious.

**FIFTH AFFIRMATIVE DEFENSE**

**(Equitable Defenses)**

Plaintiff's claims and/or remedies are barred in whole or in part under principles of equity, including laches, estoppel, waiver, and/or unclean hands.

DATED: May 1, 2025

Respectfully submitted,

ORBIT IP LLP.

By: /s/ Ehab M. Samuel  
Ehab M. Samuel (CA SBN 228296)  
David A. Randall (CA SBN 156722)

*Attorneys for dbest products, Inc.*

**CERTIFICATE OF SERVICE**

I certify that on May 1, 2025, the foregoing was electronically filed with the Clerk of the Court by using the CM/ECF system, which will send notice of electronic filing to all counsel of record.

/s/ Ehab M. Samuel

Ehab M. Samuel